1 THE HONORABLE BARBARA J. ROTHSTEIN 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 GLORIA KIDD-FORTUNE, No.: 2:23-cv-01746-BJR 11 Plaintiff. STIPULATED MOTION AND ORDER 12 TO CONTINUE TRIAL DATE AND v. PRE-TRIAL DEADLINES 13 INDIAN HARBOR INSURANCE COMPANY, a foreign insurer doing business 14 in the State of Washington, 15 Defendant. 16 17 STIPULATED MOTION 18 The parties stipulate to continue the trial date currently scheduled for February 10, 2025 19 to June 2, 2025 or to such other time as the Court deems appropriate. The parties stipulate that 20 all related pretrial deadlines should be extended a similar amount of time consistent with the 21 new trial date. 22 The parties have worked diligently in conducting written discovery and depositions to 23 date. The parties agreed to mediation with Roy Umlauf, whose first available date was July 24 24, 2024, which the parties took. The parties intend to disclose their experts informally on 25 July 15, 2024, in advance of the mediation. Should the case not settle at mediation, the parties 26

925 Fourth Avenue, Suite 3800 Seattle, Washington 98104 Telephone: 206.292.8930

1 would have only three weeks to complete discovery, including expert discovery, which the 2 parties anticipated to include at least six individuals, as the discovery deadline is currently set for August 14, 2024. However, the parties need additional time to complete discovery and 3 depose multiple experts after the date of mediation, in the event the case does not settle at 4 mediation. 5 6 The parties stipulate to the following extension of the remaining case deadlines in 7 accordance with counsel's preexisting trial conflicts: 8 Current Deadline Proposed Deadline **Expert Witness Disclosure** 7/15/24 9 Rebuttal Expert Witness Disclosure 8/14/24 Discovery Cut-off 8/14/24 10 Filing of Dispositive Motions 9/13/24 Filing of Motions in Limine 1/2/25 11 Joint Pretrial Statement 1/13/25 Pretrial conference 12 1/28/25 Trial 2/10/25 13

DATED: July 9, 2024 DATED: July 9, 2024

BULLIVANT HOUSER BAILEY PC GLP ATTORNEYS, P.S. INC.

By /s/ KathleenThompson By /s/ Scott Shawver, per email authorization Scott Shawver, WSBA #24048 Kathleen Thompson, WSBA #25767 Counsel for Plaintiff

CLYDE & CO US LLP

14

15

16

17

18

19

20

21

22

23

24

25

26

By /s/ Laura Hawes Young, per email authorization Laura Hawes Young, WSBA #39346

Co-Counsel for Defendant Indian Harbor Insurance Company

STIPULATED MOTION AND ORDER TO CONTINUE TRIAL DATE Page 2 AND PRE-TRIAL DEADLINES No. 2:23-cv-01746-BJR

Bullivant|Houser|Bailey PC

925 Fourth Avenue, Suite 3800 Seattle, Washington 98104 Telephone: 206.292.8930

9/14/24

10/14/24

12/4/24

1/3/25

4/24/25

5/5/25

5/20/25

6/2/25

ORDER IT IS SO ORDERED. Trial is continued to June 2, 2025, with pretrial dates rescheduled as proposed by the parties, set forth above. Dated this July 15, 2024. Barbara & Rothetein Barbara Jacobs Rothstein U.S. District Court Judge

No. 2:23-cv-01746-BJR